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13 *Attorneys for Millennium Drilling Co., Inc.,
14 Jonathan Feldman and Patriot Exploration
Company, LLC*

15 **UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

17 Millennium Drilling Co., Inc., a Delaware
18 Corporation,

CASE NO.: 2:12-cv-00462-MMD-CWH
(Base case)

19 Plaintiff,

20 vs.
**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE REPLIES**

21 Beverly House-Meyers Revocable Trust,
22 Beverly House-Meyers, Trustee; Grace Mae
Properties, LLC; Hamrick Trust, Robert H.
23 Hamrick and Molly Kay Hamrick, Trustees;
24 DOES I through X; and ROES I through X,

(Second Request)

25 Defendants.

26 Molly Hamrick, Beverly House-Myers, R&M
27 Hamrick Family Trust;

CASE NO.: 2:13-cv-00078-MMD-CWH
(Consolidated Case)

28 Third-Party Plaintiffs,

HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Pkwy., Suite 1000
Las Vegas, NV 89169
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1 vs.

2 Jonathan Feldman, Montcalm, LLC, Patriot
 3 Exploration Company, LLC, Carter Henson,
 4 Jr., Matthew Barnes, Robert Holt, Elizabeth
 Holt, and Schain, Leifer, Guralnick,

5 Third-Party Defendants.
 6

7 Third-Party Defendants JONATHAN FELDMAN (“Feldman”), CARTER HENSON,
 8 JR. (“Henson”), and PATRIOT EXPLORATION COMPANY, LLC (“Patriot”) (collectively,
 9 the “Patriot Defendants”), Plaintiff MILLENNIUM DRILLING CO., Inc. (“Millennium”) and
 10 Third-Party Plaintiffs/Defendants MOLLY HAMRICK, BEVERLY HOUSE-MYERS,
 11 BEVERLY HOUSE-MYERS REVOCABLE TRUST, GRACE MAE PROPERTIES, LLC,
 12 HAMRICK TRUST, ROBERT H. HAMRICK and R&M HAMRICK FAMILY TRUST
 13 (collectively, the “Third-Party Plaintiffs”), by and through their respective undersigned counsel,
 14 stipulate to the following and request an Order from this Court granting such stipulation:

15 1. On March 30, 2015, the Third-Party Plaintiffs filed their Points and Authorities
 16 in Response to Third-Party Defendants Jonathan Feldman and Patriot Exploration Company’s
 17 Omnibus Motion Re: (1) Partial Summary Judgment – Statute of Limitations; (2) Summary
 18 Judgment for Res Judicata or Collateral Estoppel; and (3) Summary Judgment on Third-Party
 19 Plaintiffs’ Claims for (1) Breach of Fiduciary Duty; (2) Breach of Contract; (3) Imposition of
 20 Constructive Trust; (4) Unjust Enrichment; and (5) Money Had and Received. (Dkt. No. 214).

21 2. Additionally, on March 30, 2015, the Third-Party Plaintiffs filed their Points and
 22 Authorities in Response to Third-Party Defendant Carter Henson’s Motion to Dismiss for Lack
 23 of Personal Jurisdiction (Dkt. No. 215).

24 3. The Parties submitted a Stipulation and [Proposed] Order To Extend Deadline to
 25 File Replies (First Request) on April 15, 2015 (Dkt. No. 216) seeking to extend the deadline for
 26 the Replies to both motions to April 28, 2015.

27 4. The Court issued an order granting the Stipulation and [Proposed] Order to
 28 Extend Deadline to File Replies (First Request) on April 16, 2015 (Dkt. No. 217).

1 5. The parties are seeking to mediate this matter, and have obtained dates for a
2 potential mediation during the week of June 8-12, 2015.

3 6. The parties want to ensure that the Court does not rule on the pending motions
4 until after the parties have had a chance to conduct the planned mediation.

5 7. In order to allow the parties to conduct the mediation without the Court having to
6 consider and possibly rule on the pending Motions, all parties are in agreement to extend the
7 Patriot Defendants' deadline to file their Replies to the above-referenced Motions to June 19,
8 2015.

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1 8. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot
2 Defendants' Replies to the above-referenced Motions are extended from April 28, 2015 to June
3 19, 2015.

4 **HOWARD & HOWARD ATTORNEYS
5 PLLC**

6 /s/ Wade B. Gochnour

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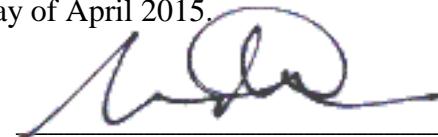
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11 **ORDER**

12 **IT IS SO ORDERED** this 28th day of April 2015.



13 **UNITED STATES DISTRICT COURT JUDGE**

14 Respectfully submitted by:

15 **HOWARD & HOWARD ATTORNEYS PLLC**

16 /s/ Wade B. Gochnour

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20 4833-8190-8259, v. 1